



STATE OF WASHINGTON POTATO COMMITTEE

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Standardization Section,
Fresh Products Branch, Fruit and Vegetable Programs,
Agricultural Marketing Service
United States Department of Agriculture
1400 Independence Ave., SW, Room 1661 South Building
Stop 0240
Washington, D.C. 20250-0240

RE: 55356 Federal Register/ Vol. 71, No. 184/ Friday, September 22, 2006

To the Federal Docket Clerk,

These comments are being submitted on behalf of the State of Washington Potato Committee (Committee). We have reviewed the proposed changes and support USDA commitment to harmonize trade between the US and Canada.

The following comments are on allowing a US #1 mixed varieties.

The Committee asks that special consideration be given to allow for packing a US #1 mixed variety of potato. This has been discussed within the Committee and some consideration needs to be given to allow industry the ability to be flexible to meet changing consumer needs and yet provide quality assurance under the guidelines of a US #1 grading requirement. More packed mixed varieties are now sold in the market place and the Committee requests that if this is to occur that a standard be followed to assure quality.

Suggested New Language to be added to the US Grades and standards:

U.S. No. 1 Mixed

"U.S. No. 1 Mixed" consists of two or more varieties of similar total packed weight, which meet the following requirements:

- (a) Mixed varietal characteristics must be packed by volume in container;**
- (b) Firm;**
- (c) Fairly clean; ²**
- (d) Fairly well shaped;**
- (e) Free from:**
 - (1) Freezing;**
 - (2) Blackheart;**
 - (3) Late blight, southern bacterial wilt and ring rot; and,**
 - (4) Soft rot and wet breakdown.**
- (f) Free from damage by any other cause. See §§51.1564 and 51.1565.**

(g) Size. Not less than 3/4 inches in diameter, unless otherwise specified in connection with the grade.

(h) For tolerances see §51.1546.

Comments on size designation.

The Committee has reviewed the size designations of the two new additions, "Creamer" and "Chef," and it finds that it is in the best interest of the U.S. Potato industry to harmonize these profiles to allow for transparent trade between nations. However, we request that USDA change the creamer maximum size designation to 1 7/8 inch to correspond to what is currently being used in the industry for "C" or creamer type potatoes. This change would not hinder the progress of the harmonization of trade between countries and would more accurately reflect what is being packed and sold in the domestic market.

In consideration of the addition, "Chef" designation, the Committee asks that this size profile be reevaluated as it has a very similar size profile encompassing both the "Medium" and the proposed changed "Large" size designation. The question that the Committee raises is that by increasing the maximum diameter and size of the "Large" size designation to 4 1/2 inches or 28 ounces, would that change alone allow for the Canadian "Chef" packed potatoes to be sold in the US.

In addition, the Committee is concerned that the addition of a "Chef" designation could cause burden to a shipper/packer to provide a preexisting size profile under a new label for both the foodservice and retail industries.

Comments on Section 51.1546 Tolerances

The addition of "En Route or Destination" tolerance gives industry a variance in grade for destination point inspections, yet keeping control of quality assurances for shipping point inspections. The Committee applauds USDA for adding this language to the standard.

Comments on Section 51.1564 External Defects

EXTERNAL DISCOLORATION -

As demonstrated in the proposed section for "Internal Black Spot," it would be in the best interest of industry that USDA, when describing light tan or light brown colors, uses an associated color chip. The use of a color chip in this instance would be both beneficial for shipping point and destination point inspection.

GREENING-

As demonstrated in the proposed section for "Internal Black Spot" it would be in the best interest of industry that USDA, when determining the point of gradient greening on the tuber when

describing, "greening," uses an associated visual aid. This would give guidance to demonstrate the point of removal for this damage.

NEMATODE (ROOT KNOT)-

More clarification is needed on the term "removal." It is suggested by the Committee to use the term aggregate when referencing removal of damaged caused by root knot nematodes. Please reference suggested new language.

Suggested New Language:

NEMATODE (ROOT KNOT)

Damage: When aggregate removal of the surface area affected causes a loss of more than 5 percent of the total weight of the potato.

Serious Damage: When aggregate removal of the surface area affected causes a loss of more than 10 percent of the total weight of the potato.

SILVER SCURF-

As purposed under § 51.1546 Tolerances, the Committee recommends that shipping point and destination point tolerances be established for the determination of damage for this pest. Please review the suggested new language.

Suggested New Language:

SILVER SCURF

Is a silvering effect in contrast with russetting of a potato.

Russet Potatoes

Shipping Point

Damage: When affecting more than 50 percent of the aggregated surface area of the potato.

Serious Damage: When its severity causes a wrinkling of the skin over more than 50 percent of the surface.

Destination Point

Damage: When affecting more than 60 percent of the aggregated surface area of the potato.

Serious Damage: When its severity causes a wrinkling of the skin over more than 60 percent of the surface.

Non-Russet Potatoes

Damage: When affecting more than 50 percent of the aggregated surface area of the potato.

Serious Damage: When its severity causes a wrinkling of the skin over more than 50 percent of the surface

WIREWORM OR GRASS DAMAGE-

More clarification is needed on the term "removal." It is suggested by the Committee to use the term "aggregate" when referencing removal of damage caused by wireworm or grass. Please reference suggested new language.

Suggested new language:


WIREWORM OR GRASS DAMAGE

Damage: When affecting the flesh of the potato and aggregated removal causes a loss of more than 5 percent of the total weight of the potato.

Serious Damage: When affecting the flesh of the potato and aggregated removal causes a loss of more than 10 percent of the total weight of the potato.

Thank you for considering the Committees comments. We look forward to providing any additional information that will assist USDA in this process.

Sincerely,



Matt Harris

Manager

State of Washington Potato Committee